

# **EXHIBIT 15**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

WATCHTOWER BIBLE AND TRACT SOCIETY  
ON NEW YORK, INC.,

Plaintiff,

v.

THE INTERNATIONAL NICKEL COMPANY,  
INC., INCO ALLOYS INTERNATIONAL, INC.,  
HUNTINGTON ALLOYS, INC., HUNTINGTON  
ALLOYS CORPORATION, SPECIAL METALS  
CORPORATION, PRECISION CASTPARTS  
CORP., VALE AMERICAS INC., INCO UNITED  
STATES, INC., INTERNATIONAL NICKEL INC.,  
VALE INCO AMERICAS INC. and VALE  
CANADA LIMITED,

Defendants.

Case No. 15 cv 4306

**DEFENDANTS VALE CANADA LIMITED AND VALE AMERICAS INC.'S  
(FORMERLY KNOWN AS INCO UNITED STATES, INC.;  
INTERNATIONAL NICKEL INC.; AND VALE INCO AMERICAS INC.)  
RULE 7.1 CORPORATE DISCLOSURE STATEMENT**

Pursuant to Federal Rule of Civil Procedure 7.1, Defendants Vale Canada Limited and Vale Americas Inc. (formerly known as Inco United States, Inc.; International Nickel Inc.; and Vale Inco Americas Inc.), by and through their attorneys, Beveridge & Diamond, P.C., hereby state as follows:

1. Vale Canada Limited is a wholly owned subsidiary of Vale, S.A., which is a publicly held corporation.

2. Vale Americas Inc. is a wholly owned subsidiary of Vale Canada Limited. Vale Americas Inc. has been formerly known as Inco United States, Inc.; International Nickel Inc.; and Vale Inco Americas Inc.

Dated: November 9, 2015

Respectfully submitted,

By: 

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*Attorney for Defendants Vale Canada Limited and  
Vale Americas Inc. (f/k/a Inco United States, Inc.;  
International Nickel Inc.; and Vale Inco  
Americas Inc.)*